

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 17-mc-00151-LPS

**PLAINTIFF CRYSTALLEX INTERNATIONAL CORPORATION’S MOTION TO
MODIFY THE STAY**

Plaintiff Crystallex International Corporation (“Crystallex”) hereby moves to modify the stay entered by the Court in its December 12, 2019, Memorandum Order that stayed all enforcement proceedings in this case until the conclusion of any proceedings in the Supreme Court or until “further order of this or any other Court lifting the stay.” (D.I. 154 at 3). Crystallex seeks modification of the stay to require PDVH to answer the August 24, 2018 writ of attachment and further require the Bolivarian Republic of Venezuela and Petróleos de Venezuela S.A. to file their certiorari petition on an expedited basis and not seek an extension of the deadline to file a certiorari petition. The grounds for this motion are set forth in Plaintiff Crystallex International Corporation’s Opening Brief In Support Of Its Motion To Modify The Stay filed contemporaneously herewith.

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